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Subject: Environmental Defense comments on Eicosenoic Acid, Methyl Ester, (Z)- (CAS# 76899-35-9)

(Submitted via Internet 6/5/04 to oppt.ncic@epa.gov, hpv.chemrtk@epa.gov, boswell.karen@epa.gov, chem.rtk@epa.gov, MTC@mchsi.com, and mark_Thomson@cromptoncorp.com)

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for Eicosenoic Acid, Methyl Ester, (Z)- (CAS# 76899-35-9).

Crompton Corporation, in response to EPA's High Production Chemical Challenge, has submitted robust summaries and a test plan describing estimated data and proposed testing of eicosenoic acid, methyl ester, (Z)- to address SIDS elements required under the Challenge. Review of this submission indicates it is very cursory. It contains no introductory information, including no mention of synthesis, production, transport, potential for human and environmental exposure or even the uses of this chemical. Further, all data for chemical/physical parameters, environmental fate and ecotoxicity were generated using estimation models. No studies of mammalian toxicity are available, so the sponsor proposes to conduct OECD guideline studies to address each of SIDS elements required to characterize the mammalian toxicity of this chemical.

With respect to those SIDS elements addressed by estimation modeling, we note that while such models have their place, they also have limitations. These limitations in the prediction of chemical/physical and ecotoxicity values are particularly a concern for very long chain molecules like eicosenoic acid, methyl ester, (Z)-, for which models frequently estimate the properties very poorly. Given the structure of this chemical, it would be more appropriate if most of these properties were determined by the relatively simple measurements or tests required.

We appreciate that studies are proposed to address all SIDS elements associated with the mammalian toxicity of this chemical. However, we encourage the sponsor to design and conduct these studies using combined protocols in order to derive the greatest amount of data from the minimum use of animals.

In summary, this submission contains too little background information and over-relies on estimation modeling to predict readily-measured chemical/physical properties and ecotoxicity of eicosenoic acid, methyl ester, (Z)-. We find it unacceptable as written.

Thank you for this opportunity to comment.

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